

Juanita Broennimann
Provence, Tiffany N v. United States of America, et al

June 16, 2022

Page 1

1 VIRGINIA:

2 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
3 SOUTH CAROLINA OF CHARLESTON DIVISION
4 IN ADMIRALTY

5 *****

6 TIFFANY N. PROVENCE, as the)
Personal Representative of)
7 the Estate of Juan Antonio)
Villalobos Hernandez,) Case No.
8) 2:21-cv-965-RMG
Plaintiff,)

9 -vs-)
10)

11 UNITED STATES OF AMERICA,)
CROWLEY MARITIME CORPORATION,)
CROWLEY GOVERNMENT SERVICES,)
12 INC.,)
DETYENS SHIPYARDS, INC., and)
13 HIGHTRACK STAFFING, INC.)
d/b/a)
14 HITRAK STAFFING, INC.)
Defendant.)

15 *****

16 DEPOSITION OF
17 THE UNITED STATES
18 BY AND THROUGH ITS CORPORATE DESIGNEE,
19 JUANITA BROENNIMANN
20 9:00 a.m. to 2:00 p.m.
21 June 16, 2022
22 Via ZOOM

23
24 Job No. 38889

25 REPORTED BY: Dawn Testa

1 this is what I have always seen.

2 Q This is the single-wire rope restraint
3 method?

4 A Yes.

5 Q And regarding your see something say
6 something standard, when you have been in yards where
7 they would restrain the davit arm in this manner, did
8 you call for a work stoppage and stand down to have it
9 done a different way?

10 A No. I am not a rigging expert. I would
11 defer to the yards expert. They do it every day.

12 The only time I would call for a stand down
13 on rigging is if I saw something with the rigging gear
14 itself, that it appeared to be failing; say, a strap
15 that was wearing through or a wire that was slipping,
16 obviously, or corroded, something like that.

17 Q So, in your experience of seeing davit arms
18 rigged this way, you have never objected to that manner
19 of rigging?

20 A No.

21 Q Do you know Dallas Verble?

22 A I do.

23 Q And how do you know Dallas?

24 A He's been the Detyens project manager for
25 several ships that I have had at Detyens.